

Steven J. Hyman (SH 2097)
Alan E. Sash (AS 8804)
McLaughlin & Stern, LLP
260 Madison Avenue
New York, New York 10016
Tel:(212) 448-1100
Fax:(212) 448-0066
asash@mclaughlinstern.com

Abbey Spanier Rodd & Abrams, LLP
212 East 39th Street
New York, New York 10016
Tel: (212) 889-3700
Fax: (212) 684-5191

Attorneys for Proposed Interim Class

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

X

In Re Pet Foods Products
Liability Litigation

: Civil Action No. 07-2867 (NLH)
:
: MDL DOCKET NO. 1850
:
: ALL CASES

X

CERTIFICATION OF COUNSEL

Alan E. Sash, of full age, hereby certifies:

1. I am an attorney at law admitted in the State of New Jersey, a partner with the New York firm McLaughlin & Stern, LLP and represent plaintiffs Linda Tinker, Gail Bryan, Susan Hance-Goodman, Crystal Ward, Darlene Ward, Alexandra Starkey, William McMahon, Karole VanDusen and Marjorie Ready.
2. This certification is submitted in support of the Motion for an order appointing McLaughlin & Stern, LLP and Abbey Spanier Rodd & Abrams, LLP (the "Firms") as Interim

Counsel for the Class in this Action.

3. The Firms have recently learned of reports that one defendant in this action continued to sell recalled Menu Foods products long after the announcement of the recall. If this is the case, the Firms will discuss with their clients a potential lengthening of the class period with regard to this defendant.

4. The Firms have recent, highly relevant experience in the litigation of similar actions and, accordingly, should be appointed as interim class counsel. The Firms have, on two previous occasions, acted as co-counsel in the matter of *Glass v. S&M NuTec, LLC*, 06-0853-CV-W (GAF), currently venued in the United States District Court for the Western District of Missouri and *Knutsen v. Petco Animal Supplies Stores, Inc.*, 07-CV-06114 (RJH), currently venued in the United States District Court for the Southern District of New York. Both of these cases are still pending and involve the same alleged defective dog treat called Greenies. Since these actions were commenced, the original owners of the company that made Greenies sold the company to Mars, Inc. and the Greenies product has been reformulated. Like this case, the Greenies litigations involved hundreds of people from over twenty states claiming that their dogs died or were injured from Greenies. The Firms' work on these cases has yielded substantial experience and knowledge regarding the inherent difficulties in proving causation on a class-wide basis in a case such as this, as well as knowledge of the difficulties of proving commonality, typicality, adequacy of representation and superiority for class certification under Federal Rule of Civil Procedure 23(a) and (b).

5. In addition to the legal hurdles the Firms have faced in the Greenies cases, the Firms also presided over the discovery process. The Firms guided ten named plaintiffs in the

Glass action through document production, responses to interrogatories and requests for admission, and the scheduling of depositions (which to this date have been postponed pending settlement discussions).

6. The issues in the Greenies cases received considerable national media attention in the written press as well as on cable and network television including, among other shows, CNN's "Paula Zahn Now" and *New York Newsday*. I was interviewed and appeared on "ABC World News with Charles Gibson" concerning the law of animals for a story about the Menu Foods recall. I am also a Member of the New York State Bar Association's Special Committee on Animals and the Law and a board member of Pet Safe Coalition, Inc., a not-for-profit corporation which works with the Nassau County Office of Emergency Management in times of disaster. I have worked on large complex litigations while serving as a judicial law clerk to the Hon. John A. McLaughlin (retired Superior Court Judge, Hudson County Vicinage) and as an associate at the law firm of Rivkin Radler, LLP, involving multi-state CERCLA (commonly known as Superfund) waste sites. Therefore, I am familiar with both the defense and plaintiff's sides of complex cases.

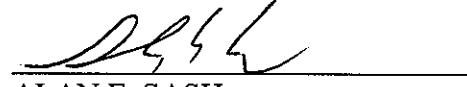
7. The law firm of Abbey Spanier Rodd & Abrams, LLP is a highly successful law firm with a nationwide practice that exclusively focuses on securities, antitrust, employment and consumer protection class actions. With more than 40 years of class action practice, the firm has earned an excellent reputation for effective and efficient legal representation in both the federal and state courts. As a result, it has frequently been appointed as lead or co-lead counsel in federal and state cases resulting in substantial recoveries for class members.

8. The firm resume of Abbey Spanier Rodd & Abrams, LLP is attached hereto as Exhibit A.

9. The Firms respectfully submit that the Court should consider the Firms' commitment to the interests of the Class, both financially and in the Firms' counseling of absent Class members. The Firms have avoided excessive cost to the Class by refraining from submitting duplicative briefing at the venue selection stage of this Action. For instance, when several firms filed motions with the Judicial Panel on Multidistrict Litigation in which venue was sought in this District—the first choice of the Firms and their clients—the Firms avoided submitting duplicative briefing seeking the same venue. The Firms can also keep expenses for the Class low by avoiding the hiring of liaison counsel, as I am admitted to practice in the State of New Jersey and in this District Court. With regard to counseling putative Class members, the Firms have received dozens of calls from putative Class members and advised them of all options, and all courses of action, available in this difficult situation.

I hereby certify that the foregoing facts stated by me are true. I am aware that if any of the foregoing facts stated by me are false, I am subject to punishment.

Respectfully Submitted,



ALAN E. SASH